

1 BARBARA MARIE RIZZO (CSBN 172999)  
2 Attorney at Law  
3 P. O. Box 383103  
4 Waikoloa, HI 96738  
5 Telephone: 808-785-6088  
6 Fax: 808-440-0699  
7 E-Mail: mail@fedlaborlaw.com

8 Attorney for Plaintiff Tara Amber Dolan

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

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TARA AMBER DOLAN, ) Case No.: 2:24-cv-01617-DJC-JDP  
Plaintiff, )  
v. ) STIPULATION AND ORDER APPROVING  
FRANK BISIGNANO, ) SETTLEMENT OF ATTORNEY FEES  
Commissioner of Social Security, ) PURSUANT TO THE EQUAL  
Defendant. ) ACCESS TO JUSTICE ACT,  
 ) 28 U.S.C. §2412(d)  
\_\_\_\_\_  
)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned counsel, subject to the Court's approval, that Plaintiff be awarded TWENTY THOUSAND DOLLARS (\$20,000.00) in attorney fees and ZERO COSTS AND EXPENSES under the Equal Access to Justice Act ("EAJA") 28 U.S.C. §2412(d). This amount represents compensation for legal services rendered on behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28 U.S.C. §2412(d). Plaintiff's net worth at the time of this action was less than \$2 million.

After the Court issues an order awarding EAJA fees to Plaintiff, the Government will consider the matter of Plaintiff's assignment of EAJA fees to Plaintiff's attorney. Pursuant to Astrue v. Ratliff, 130 S.Ct. 2521 (2010), the ability to honor the assignment will depend on whether the fees are subject to any offset allowed under the United States Department of the Treasury's Offset Program. After the order awarding EAJA fees is entered, the Government

1 will determine whether the fees are subject to any offset. If the Department  
2 of the Treasury determines that Plaintiff does not owe a federal debt, the  
3 Government shall cause the payment of fees to be made directly to Plaintiff's  
4 counsel, Barbara Marie Rizzo, pursuant to the assignment executed by Plaintiff.  
5 Any payments made shall be delivered to Plaintiff's counsel.

6 This stipulation constitutes a compromise settlement of Plaintiff's  
7 request for EAJA attorney fees and does not constitute an admission of  
8 liability on the part of Defendant under the EAJA. Payment of the agreed  
9 amount shall constitute a complete release from, and bar to, any and all claims  
10 that Plaintiff and/or Plaintiff's counsel may have relating to EAJA attorney  
11 fees in connection with this action.

12 This award is without prejudice to the rights of Plaintiff's counsel to  
13 seek attorney fees pursuant to the Social Security Act, 42 U.S.C. §406(b),  
14 subject to the offset provisions of the EAJA.

15 Respectfully submitted,

16 Dated: November 14, 2025                          "/s/Barbara Marie Rizzo"  
17    BARBARA MARIE RIZZO  
18    Attorney for Plaintiff

19 Dated: November 14, 2025                          "/s/Edmund Darcher"  
20    EDMUND DARCHER  
21    (As authorized via e-mail)  
22    Special Assistant United States Attorney  
23    Attorney for Defendant  
24    Commissioner of Social Security

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

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6 TARA AMBER DOLAN, ) Case No.: 2:24-cv-01617-DJC-JDP  
7 )  
8 Plaintiff, ) [PROPOSED] ORDER GRANTING  
9 v. ) PARTIES' STIPULATION FOR ATTORNEY  
10 ) FEES PURSUANT TO THE EQUAL ACCESS  
11 ) TO JUSTICE ACT, 28 U.S.C.  
12 ) S2412 (d)  
13 )  
14 )  
15 PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiff shall be  
16 awarded attorney fees in the amount of TWENTY THOUSAND DOLLARS  
17 (\$20,000.00) AND ZERO COSTS AND EXPENSES, as authorized by 28 U.S.C.  
18 S2412(d), subject to the terms of the above referenced Stipulation.  
19 IT IS SO ORDERED.  
20  
21 IT IS SO ORDERED.

22 Dated: November 18, 2025

  
23 JEREMY D. PETERSON  
24 UNITED STATES MAGISTRATE JUDGE  
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